

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

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4 BACKERTOP LICENSING LLC,)
5 Plaintiff,)
6 v.) C.A. No. 1:22-cv-00573-CFC
7 AUGUST HOME, INC.,)
8 Defendant.)
9 BACKERTOP LICENSING LLC,)
10 Plaintiff,) C.A. No. 1:22-cv-0572-CFC
11 v.)
12 CANARY CONNECT, INC.,)
13 Defendant.)

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16 Thursday, July 20, 2023
17 1:00 p.m.
Hearing

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19 844 King Street
Wilmington, Delaware

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21 BEFORE: THE HONORABLE COLM F. CONNOLLY
United States District Court Judge

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1 APPEARANCES:

2 CHONG LAW FIRM PA
3 BY: JIMMY CHONG, ESQ.

4 -and-

5 FINGER & SLANINA
6 BY: DAVID FINGER, ESQ.

7 Counsel for the Plaintiff

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1 P R O C E E D I N G S
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3 (Proceedings commenced in the courtroom beginning at
4 1:00 p.m.)
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6 **THE COURT:** Good afternoon. Please be seated.
7 Mr. Chong and Mr. Finger.

8 Go ahead, Mr. Finger. How are you?

9 **MR. FINGER:** Thank you, Your Honor. I am
10 assuming Your Honor has read the objection that was filed.

11 **THE COURT:** Yes.

12 **MR. FINGER:** I don't have much to add to that
13 other than to answer Your Honor's questions.

14 The witness, Ms. LaPray, is not here. You have
15 received some documents, and I wanted to explain the
16 background to that a little bit.

17 **THE COURT:** Yes.

18 **MR. FINGER:** I think it was oversimplified in
19 Mr. Burn's letter. When deciding how we were approaching
20 this, Mr. Burns had documents in his possession, and one
21 option was to give them back. But I felt that Your Honor
22 would not accept that as superior to a Court order.

23 So since they were already in his possession,
24 since we did not want to get him in trouble with the
25 Court, we said, okay, they're already in your possession.

1 Let them go. But beyond that, my clients are not
2 participating.

3 **THE COURT:** When you say, "clients," plural,
4 who are your clients?

5 **MR. FINGER:** I'm sorry. Well, I represent
6 Creekview in tomorrow's hearing and Backertop Licensing
7 here today.

8 **THE COURT:** So you've instructed Mr. Burns now
9 that it was okay for him to turn over all the documents in
10 his possession, custody, and control that were responsive
11 to the original document request?

12 **MR. FINGER:** Yes, Your Honor. I saw a letter
13 from him docketed yesterday explaining that he is doing
14 that and that he is delivering in some fashion -- I don't
15 know if he's already done it -- a USB drive with the
16 documents on them.

17 **THE COURT:** All right. And then just so I'm
18 clear, what is it, if anything, about his description of
19 the situation that you take issue with?

20 **MR. FINGER:** Well, as far as, it's just he
21 said -- or they changed their mind without any explanation
22 of the reasoning, so I've added to that.

23 **THE COURT:** Oh, you're just adding to it.

24 **MR. FINGER:** Yes.

25 **THE COURT:** Oh, I see. All right.

1 **MR. FINGER:** I felt it was a little more -- it
2 was not sufficiently illustrative of the reasoning.

3 **THE COURT:** Okay. All right. So he has
4 produced documents.

5 **MR. FINGER:** Yes.

6 **THE COURT:** All right. And then Mr. Chong,
7 just within the last hour, I think, produced documents.
8 Correct, Mr. Chong?

9 **MR. CHONG:** I had ordered to have them hand
10 delivered yesterday afternoon. I'm not sure when they
11 came in.

12 **THE COURT:** Okay. We just got them. All
13 right. And is this the same -- well --

14 **MR. FINGER:** I don't know if it is duplicative,
15 Your Honor.

16 **THE COURT:** Well, okay, but you've given
17 Mr. Chong permission to turn over those documents.

18 **MR. FINGER:** I did not want to have Mr. Chong,
19 who is a member of this bar, particularly, to get in
20 trouble with Your Honor.

21 **THE COURT:** All right. And then Ms. LaPray is
22 not -- did not show today.

23 **MR. FINGER:** Correct, Your Honor.

24 **THE COURT:** All right. So it seems to me what
25 I ought to do is set a hearing for good cause as to why

1 she should not be held in contempt.

2 So I think why don't we do that for August 10th
3 at 1:00. Will that work?

4 **MR. FINGER:** If I may, Your Honor, I'm on
5 vacation from the 4th through the 12th, so if Your Honor
6 can make it a little bit later. And I can't get to my
7 calendar because it's in a pouch.

8 **THE COURT:** You're welcome to go --

9 **MR. FINGER:** It's in a pouch, so I can't even
10 open it. I didn't have my bar card, so I apologize.

11 **THE COURT:** Okay.

12 **MR. FINGER:** I haven't been in this Court in so
13 long I didn't realize that's how it worked.

14 **THE COURT:** Well, I want to make sure you're
15 afforded and Ms. LaPray is afforded process.

16 It may be, if I set a good cause hearing, are
17 you just going to file something that says, we're not
18 showing up again? Do you know?

19 **MR. FINGER:** Well, I suppose, Your Honor, to --
20 I haven't given it a lot of though, but I think my
21 reaction would be, basically, to respond, arguing that the
22 order from which Your Honor is seeking a contempt ruling
23 is invalid.

24 It's the same arguments that we've made in the
25 objection, only now, I guess, organized in the context of

1 a response.

2 **THE COURT:** Okay.

3 What's the dates you said you are away?

4 **MR. FINGER:** The 4th through the 12th. And
5 just so Your Honor knows, I think it's around the 20th, I
6 have a trial in Chancery. It's a half-day trial,
7 hopefully.

8 **THE COURT:** On the, what day do you think it
9 is?

10 **MR. FINGER:** Either the 20th or the 21st.

11 **THE COURT:** The 21st is a Monday, so I'll bet
12 you it's the Monday.

13 **MR. FINGER:** Let me put it this way, Your
14 Honor, I'm happy to -- we can set a date, but if Your
15 Honor is open to it, if there is any conflict, I will
16 inform the Court.

17 **THE COURT:** That would work.

18 Well, here's what else we could do. Why don't
19 we set it for August 1st before you go away?

20 **MR. FINGER:** What day of the week is that?

21 **THE COURT:** It's a Tuesday.

22 **MR. FINGER:** Tuesday.

23 **THE COURT:** Will that give you enough time?

24 **MR. FINGER:** I think that's doable. I'm only
25 asking because I'm getting married.

1 **THE COURT:** Oh, wow. Congratulations.

2 **MR. FINGER:** Thank you. And this is going to
3 be -- it's not going to be the first, we're getting a
4 marriage license that week. Oh, I'm sorry, we're getting
5 it in late July, so that should work out fine.

6 **THE COURT:** Okay. Wow.

7 **MR. FINGER:** I get that reaction a lot, Your
8 Honor.

9 **THE COURT:** Congratulations.

10 **MR. FINGER:** Thank you.

11 **THE COURT:** Well, why don't we set, how about
12 for August 1st at 10:00 a.m.?

13 **MR. FINGER:** All right. And when would Your
14 Honor like our --

15 **THE COURT:** Well, actually, I'm not requiring
16 anything.

17 The way I look at it is this, I want to make
18 sure we comport with due process, and if your position
19 isn't going to change and there's no justification that
20 you haven't already brought to my attention --

21 **MR. FINGER:** You could accept it?

22 **THE COURT:** -- I would imagine I'm going to
23 hold her in civil contempt and impose coercive measures to
24 try to get her to comply with a Court order. Clearly, the
25 Court is empowered to do that.

1 **MR. FINGER:** So would it be all right, Your
2 Honor, if we just say that the objection we filed will
3 count as our submission in connection with a contempt? Or
4 do you want it --

5 **THE COURT:** You do whatever you want to do.

6 **MR. FINGER:** Okay.

7 **THE COURT:** You are going to be given, and
8 Ms. LaPray is going to be given an opportunity to be
9 afforded -- I'm going to strike that.

10 She is going to be given an opportunity to show
11 good cause why she shouldn't be held in contempt for
12 disobeying a Court order.

13 Now, it does strike me, though, in light of the
14 productions from counsel and some of the issues that were
15 raised at the hearing in June, that it appears that
16 Backertop, your client, has not complied with the document
17 production order.

18 Do you contest that?

19 **MR. FINGER:** I can't say or not. I have not
20 seen the documents.

21 **THE COURT:** For instance, as I discussed with
22 Mr. Chong and Mr. Burns last time, there's attachments
23 missing from e-mails. There are documents referenced in
24 e-mails that weren't included.

25 The other thing is we have the benefit of

1 productions from other related Mavexar cases, and it's
2 clear from the production in those cases that we must
3 be -- that we don't have all the documents.

4 And then there's just common sense. There's --
5 unless there's just really no normal business-type
6 dealings here, it's just very apparent that there's no
7 written communications about matters you'd expect to see
8 written communications.

9 Is it possible everything was conducted by
10 phone? I suppose so.

11 **MR. FINGER:** Especially in a small company.

12 **THE COURT:** Could be. But anyway, the point
13 is, we also had text messages produced in at least one
14 other related case, and, again, if the parties were acting
15 consistently with all Mavexar-related LLCs, you would
16 expect to have seen text messages.

17 But I'm not making any definitive ruling. What
18 I'm saying is that that's hanging out there, and if you,
19 for instance, knew that, in fact, yes, Backertop had not
20 produced all the documents consistent with the order, it
21 would be helpful to get that on the record and wrap
22 everything up all at once.

23 **MR. FINGER:** Your Honor, I believe in candor to
24 the Court, so I will investigate and advise Your Honor.

25 **THE COURT:** And I also think it's not just

1 candor; it's just efficiency.

2 In other words, I don't know what Backertop's
3 end game is or Mavexar's end game or Ms. LaPray's end game
4 is. But it just seems, even those folks would be served
5 by trying to do things efficiently.

6 **MR. FINGER:** Your Honor, I don't mean to throw
7 my friend under the bus, but since he did produce some
8 documents, he may be in a better position to answer those
9 questions if Your Honor wants to inquire.

10 **THE COURT:** And I will ask Mr. Chong a couple
11 questions about that; although, my guess is that Mr. Chong
12 has been left largely in the dark about a lot of these
13 things.

14 **MR. FINGER:** Very well, Your Honor. Thank you.

15 **THE COURT:** Mr. Chong, can I just ask you on
16 that, question you about some of the documents?

17 **MR. CHONG:** Yes.

18 **THE COURT:** So in terms of Backertop's
19 compliance with the document request, can you just tell me
20 what efforts you made to confirm that Backertop had, and,
21 you know, was there anything more than you speaking
22 directly with somebody from Mavexar or with Ms. LaPray?

23 **MR. CHONG:** I mean, I spoke with Mavexar, with
24 Ms. LaPray, and with Attorney Burns, and received
25 verbal -- they verbally told me that they have searched

1 everything and have produced everything that they could
2 find in compliance with your order, Your Honor.

3 **THE COURT:** So, for instance, there is, in the
4 document production that we just got from you within the
5 last hour.

6 I realize you may have filed it yesterday or
7 instructed deliverers yesterday, but we didn't get it
8 until a few minutes ago.

9 But just quickly looking at it, there's at
10 least two instances I saw that have a link to a lockbox of
11 documents that apparently were provided to Ms. LaPray by
12 Mavexar-type people. I didn't see the contents of the
13 lockbox in here.

14 **MR. CHONG:** Lockbox?

15 **THE COURT:** Yeah. Did I say lockbox? That's
16 my, sorry, my age showing. A Dropbox.

17 **MR. CHONG:** Oh, a Dropbox.

18 **THE COURT:** Let me give you another example.
19 You've got -- and you've designated this confidential.
20 The very first document is the agreement between your law
21 firm, right, and Backertop.

22 You've produced these same agreements during
23 hearings with no assertion of privilege, how is that
24 privileged here?

25 **MR. CHONG:** They were produced -- when they

1 were previously produced -- and I have to go back and
2 check the records -- my understanding was that we were
3 producing everything under privilege, and that's why they
4 were not filed.

5 **THE COURT:** But you've introduced this at a
6 hearing in front of me. Right. You actually put up the
7 letter. And there was no objection. No?

8 **MR. CHONG:** I would have to recall that. I
9 mean, I would like to go back and look into that.

10 I believe -- I don't -- I don't recall off the
11 top of my head.

12 **THE COURT:** Okay, then let's tackle this. Then
13 I've got a copy of an engagement letter. There is no
14 cover e-mail. There is nothing that you would expect to
15 see as to how this document got transported between your
16 law firm and Ms. LaPray, how signatures got on it, right.
17 In your production, there's nothing attached to that.

18 I mean, do you remember how you ended up
19 getting in Ms. LaPray's hands an engagement letter, how it
20 was executed by her, how you got it back? Do you remember
21 anything about that?

22 **MR. CHONG:** I don't. I mean, I produced
23 everything -- I went through my search on my e-mail, and
24 everything that was on my search, I produced. I don't
25 recall specifically. I don't, Your Honor.

1 **THE COURT:** All right. Well, then, you know,
2 when I look at -- do you have this production in front of
3 you by any chance?

4 **MR. CHONG:** Yes, Your Honor.

5 **THE COURT:** So, like, if you turn to Page 26.
6 There's an e-mail there from you to Mr. Burns. It says,
7 "attachment image 1, image 2." I don't see them in here.
8 At least I don't think I do.

9 **MR. CHONG:** I think that's just his -- his firm
10 logo.

11 **THE COURT:** Okay.

12 **MR. CHONG:** That's the attachment is his firm
13 logo.

14 **THE COURT:** All right. Then turn to the next
15 page, Page 28, here's the Dropbox, right? Folks from
16 IP Edge are informing Mr. Burns that here's the link to
17 the Dropbox that Backertop has with --

18 **MR. CHONG:** I guess, so this information, I
19 think -- I believe this is attorney/client privilege, and
20 I think at this point, if we were to discuss this, I think
21 if we could seal the courtroom, and we could --

22 **THE COURT:** I'm not going to seal the
23 courtroom. I haven't discussed anything that could
24 reasonably be characterized as attorney/client privilege.

25 All I'm talking about is a link to a Dropbox.

1 That's it. I'm not asking about the content of the
2 Dropbox, and I'm not going to seal the courtroom.

3 All I want to know is, can you tell me where
4 the documents located in the Dropbox are? Were they
5 produced? That's all I'm looking for.

6 **MR. CHONG:** I guess I would have to go and see
7 if that link is still active. I don't know.

8 **THE COURT:** So you don't know. So it doesn't
9 sound like you're in a position to say that you really
10 have done anything other than obtain oral confirmation
11 from Ms. LaPray that Backertop's document production is
12 complete; is that fair?

13 **MR. CHONG:** From Ms. LaPray, Mr. Burns,
14 Mavexar. And I had, you know, went through the
15 attachments as of the last hearing and produced the
16 attachments from my e-mails that I had in my possession.

17 And other than that, I don't have access to
18 their Internet system, so I cannot access their Internet
19 system, so I can just only produce what I have and ask
20 them.

21 **THE COURT:** All right. But you've produced all
22 the attachments to the e-mails that you've produced; is
23 that fair?

24 **MR. CHONG:** Yes, that is correct.

25 **THE COURT:** Okay. All right. Anything else

1 you wish to say?

2 **MR. CHONG:** No, Your Honor.

3 **THE COURT:** All right. So then, we'll have the
4 hearing, we said it's going to be on August 1st at
5 10:00 a.m., a good cause hearing to show why Ms. LaPray
6 should not be held in civil contempt.

7 Anything else?

8 **MR. FINGER:** I may know the answer to this
9 already, but I wanted to confirm. Tomorrow, we have the
10 Creekview hearing. Your Honor, we may need to make a
11 record, but my question is, do we need to go through it
12 other than, I guess Your Honor might need to make a record
13 for whatever other action Your Honor is going to take.

14 I don't think the information you're going to
15 receive is going to be any different. Not that I'm
16 opposed to visiting the Court.

17 **THE COURT:** I see. So you're, basically,
18 saying, I mean, that there's a -- they're obviously, they
19 proceeded along a different calendar.

20 **MR. FINGER:** Correct.

21 **THE COURT:** And outstanding now in Creekview is
22 just an order requiring Jacob LaPray to come to court.

23 **MR. FINGER:** Correct. And to the extent Your
24 Honor concludes the documents are incomplete, my client,
25 in this case, Creekview, isn't going to be producing any

1 further documents.

2 **THE COURT:** Well, then, so, yes, then I guess
3 why not just hold the hearings together. You want to set
4 it for the same date?

5 **MR. FINGER:** Sure.

6 **THE COURT:** We'll do that. We'll cancel
7 tomorrow's hearing. We'll just set for August 1st, at
8 10:00 a.m., then, a hearing to offer Mr. LaPray an
9 opportunity to show good cause why he should not be held
10 in civil contempt.

11 Let me just ask you, Mr. Finger, under your
12 legal theory, how could a Federal District Court ever have
13 a natural person appear on behalf of a corporate entity
14 when that corporate entity does not have a natural person
15 within its employ or ownership that falls within 100 miles
16 of the state in which the District Court is located?

17 **MR. FINGER:** It can be a cumbersome process.
18 And I'm spit-balling it to be honest with Your Honor.

19 **THE COURT:** Well, under your theory, it could
20 never happen, right?

21 **MR. FINGER:** Well, that could be if, for
22 example, Your Honor has had the option of having her
23 appear by video. Your Honor denied that request. But
24 that is one thing that might have not led to this.

25 But in a larger sense, Your Honor could appoint

1 someone, appoint a lawyer or speak to a Court in that
2 foreign jurisdiction and engage its assistance in a
3 specific aspect of this.

4 The question here is really the travel or it
5 was previously. So as I said, it's not -- I can't say
6 that there's a way to get them physically here, but there
7 are ways to take testimony.

8 **THE COURT:** It will be a very narrow issue,
9 then. You're saying it's really -- this is solely about
10 travel; that's what your position is now?

11 **MR. FINGER:** Well, I mean, it's travel and
12 inconvenience. And not -- and I don't say inconvenience
13 like you stubbed your toe.

14 I mean, like her affidavit has previously
15 shown, she has child care. She has -- this is a
16 layperson, you know, not a CEO from a major corporation.
17 And it's imposing. Of course, it's imposing on anyone to
18 get called to come to court. It's simply someone who is
19 miles, well over 100 miles away.

20 That certainly was -- the goal was to minimize
21 her inconvenience, and, again, I don't -- it's not a small
22 inconvenience -- by having an alternative to her coming
23 here.

24 But when Your Honor denied that, sort of was --
25 triggered what's before Your Honor now.

13 I don't think it's too much ask that she spend
14 what looks to be about \$300 and miss one day, not even an
15 entire 24-hour day, to come to court to answer important
16 questions.

17 And as I say, as I said in the opinion, it's,
18 especially given just the unusual nature of this case,
19 this situation between Mr. Burns and Mr. Chong, and it
20 seems especially important.

21 And given all the other matters that I've
22 raised as concerns and the Federal Circuit has upheld as
23 legitimate concerns, it seems entirely appropriate and
24 really necessary, in my view, to assess the credibility of
25 that person in person.

7 MR. FINGER: I understand, Your Honor --

10 **MR. FINGER:** -- but the order is not the only
11 thing they objected to. But thank you, Your Honor.

14 **MR. FINGER:** I'm 90 percent sure it is
15 workable, but I will contact the Court immediately if
16 there's a problem.

19 (The proceedings concluded at 1:26 p.m.)

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2 CERTIFICATE OF COURT REPORTER

3

4 I hereby certify that the foregoing is a true and
5 accurate transcript from my stenographic notes in the
6 proceeding.

7

8 /s/ Bonnie R. Archer
9 Bonnie R. Archer
Official Court Reporter
U.S. District Court

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MR. CHONG: [16] 5/9 11/17 11/23 12/14 12/17 12/25 13/8 13/22 14/4 14/9 14/12 14/18 15/6 15/13 15/24 16/2 MR. FINGER: [45] THE COURT: [62]	1st [51] 7/19 8/12 16/4 17/7 20/13	2 20 [1] 1/16 2023 [1] 1/16 20th [2] 7/5 7/10 21st [2] 7/10 7/11 24-hour [1] 19/15 26 [1] 14/5 28 [1] 14/15	3/22 8/21 access [2] 15/17 15/18 accurate [1] 21/5 across [1] 19/12 acting [1] 10/14 action [1] 16/13 active [1] 15/7 actually [2] 8/15 13/6 add [1] 3/12 added [1] 4/22 adding [1] 4/23 addressed [1] 19/5 adjourned [1] 20/18 advise [1] 10/24 affidavit [1] 18/14 afforded [3] 6/15 6/15 9/9 about [13] 4/18 8/11 10/7 11/11 11/12 11/16 1:00 [3] 13/21 14/25 15/1 18/9 1:22-cv-00573 19/14 20/2 20/9 accept [2]	agreements [1] 12/22 ahead [1] 3/8 all [29] along [1] 16/19 already [5] 3/23 3/25 4/15 8/20 16/9 also [2] 10/13 10/25 alternative [1] 18/22 alternatively [1] 19/4 although [1] 11/11 am [1] 3/9 another [1] 12/18 answer [4] 3/13 11/8 16/8 19/15 any [6] 4/21 7/15 10/17 14/3 16/15 16/25 anyone [1] 18/17 anything [8] 4/18 8/16 11/21 13/21 14/23 15/10 15/25 16/7 anyway [1] 10/12 apologize [1] 6/10
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